

CATHERINE M. BOND
P.O. Box 641
Frederick, Maryland 21701

COMPLAINANT

VS.

CLYDE R. SMITH, JR.
P.O. Box 341
Frederick, Maryland 21701

RESPONDENT

*

IN THE

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CIRCUIT COURT FOR

*

FREDERICK COUNTY,

*

MARYLAND

*

NO. 28,349 EQUITY

BILL OF COMPLAINT FOR
PARTITION OF REAL ESTATE

Now comes your Complainant, Catherine M. Bond, by Clifford R. Bridgford and SHEFFIELD, ROBERTS & BRIDGFORD, her attorneys, and pursuant to the provisions of Section 14-107 of the Real Property Article of the Annotated Code of Maryland, respectfully represents to this Court:

FIRST: That your Complainant and the Respondent, Clyde R. Smith, Jr., are the owners, in fee simple, of real estate located on the east side of Sunday Lane, in the Lewistown Election District, Frederick County, Maryland, containing 0.50 acres, more or less, by virtue of a deed from Raymond C. Clem and Hilda I. Clem, his wife, and Howard L. Huffer, dated April 11, 1963, and recorded on August 15, 1963 among the Land Records of Frederick County, Maryland, in Liber 688, folio 697, et seq, said property more particularly described in said deed as follows:

Beginning for the lot or parcel of land hereby intended to be conveyed, at a point in the center of Sunday Lane at the end of 20 feet on a line drawn South 71° 00' West from an iron pipe marker in the East margin of said road, said point of beginning also located 16 feet North of centerline of the Bloomfield Road projected and 358 feet Northwest of the South boundary line of the whole tract of 4 acres, 1 rood, and 21 square perches, as described in the above mentioned deed from Lillian E. Leatherman, et al, unto the said Raymond C. Clem and Hilda I. Clem, his wife, dated March 7, 1952, and recorded in Liber 501, folio 153, et seq, one of the Land Records of Frederick County, Maryland; and running thence by lines of division now made (1) North 71° 00' East 20 feet to an iron pipe marker, (2) North 71° 00' East 196 feet to an iron pipe marker in the division line of this parcel and the Wachter Farm and running thence by and with said division line (3) North 23° 05' West 115 feet to an iron pipe marker, thence by lines of division (4) South 71° 00' West 186.5 feet to an iron pipe marker in the East margin of Sunday Lane (5) South 71° 00' West 20 feet to the center of said road or lane, and with same (6) South 18° 20' East 115.0 feet to the place of beginning.